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January 19, 2005

VIA FACSIMILE

CDR [REDACTED]  
US Navy Legal Advisor  
Office for the Administrative Review (OARDEC)  
2000 Navy Pentagon RM 4D545  
Washington, DC 20350-2000

Re: Administrative Review Board Submission for Salah Abdul Rasul Al Bloushi, ISN # 227 (u)

Dear [REDACTED]

- (u) We are the attorneys for Salah Abdul Rasul Al Bloushi (ISN # 227). We make this submission to the Administrative Review Board ("ARB") pursuant to directions provided by you and [REDACTED] senior trial counsel in the United States Department of Justice. We request that you forward this document to the ARB that will review the detention of Mr. Al Bloushi.
- (u) There is no reliable evidence that Mr. Al Bloushi is, or has ever been, a threat to the United States or its allies. See Department of Defense Memorandum dated September 14, 2004 re implementation of administrative review procedures. In making this submission, we do not waive, and expressly reserve, our right to challenge the ARB proceedings and any final determination on constitutional, statutory and other grounds before any court of competent jurisdiction. In addition, please be advised that due to restrictions imposed by the government on attorney-client communications, we have not been able to confer with Mr. Al Bloushi regarding this submission.
- (u) The following factors should be taken into consideration by the ARB with respect to the continued detention of Mr. Al Bloushi:
- (u) • He was not captured on or near any battlefield. Instead, he was taken into custody in Pakistan by the Pakistani authorities.
  - (u) • There is no credible evidence that he participated in any hostilities against the US or its allies.
- (S//NF) [REDACTED]

Classified by:  
multiple sources

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Declassify on: source  
marked x1  
Date of source: 10 OCT 03

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Enclosure (3A)  
EC - C

**[REDACTED]** This thin  
reed of speculation and innuendo is hardly sufficient evidence to  
establish that Mr. Al Bloushi is a member of al Qaida or any other  
terrorist organization, or to justify his indefinite incarceration.

- (d) Based on the foregoing, we respectfully submit that no legal or moral justification exists for the continued detention of Mr. Al Bloushi. Accordingly, he should be immediately released to his home state without limitations. In the alternative, we request that he be released to the Government of Bahrain with conditions agreed upon between Bahrain and the United States.

Very truly yours,



Mark S. Sullivan

**"UNCLASSIFIED"**

ISN 227

Classification was derived  
from classified enclosures  
& exhibits to the Combatant  
Status Review Tribunal  
Decision Report, which  
is attached to a memorandum  
for Director, CSRT, entitled:  
CSRT Record of Proceedings  
ICO ISN# 227, dated  
30 Sep 2004